

April 28, 2005

Natalie Rutherford
Global Regulatory Manager
FMC Corporation
Agricultural Products Group
1735 Market Street
Philadelphia, PA 19103

Dear Ms. Rutherford:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the letter for 3-(2,2-dichloroethenyl)-2,2 dimethylcyclopropanecarbonyl chloride (DV acid chloride; CAS No. 52314-67-7) posted on the ChemRTK HPV Challenge Program Web site on January 9, 2004.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

The FMC Corporation did not submit a test plan or robust summaries for this chemical. A letter was submitted describing the reactivity of DV acid chloride and the infeasibility of testing. EPA agrees that the highly reactive nature of these chemicals may preclude many tests on the parent chemical. However, in such cases, hydrolysis or other decomposition products need to be addressed. The hydrolysis half-life of DV acid chloride suggests that test data on the hydrolysis products may be more appropriate for many of the required SIDS endpoints. Other highly reactive substances have been sponsored in the Challenge program and have been tested in ways that reflect the activity of the parent substance, decomposition products, or both (for example, see HPV Challenge submissions and EPA Comments on cyclohexyl isocyanate, chloroacetyl chloride, triisopropyl borate, benzoyl chloride, and diketene). For health effects, data on well-supported analogs may be of use. For ecological effects, relevant guidance can be found on the OECD Web site (see *Guidance on Aquatic Toxicity Testing of Difficult Substances and Mixtures* at [http://www.olis.oecd.org/olis/2000doc.nsf/LinkTo/env-jm-mono\(2000\)6](http://www.olis.oecd.org/olis/2000doc.nsf/LinkTo/env-jm-mono(2000)6)). Physicochemical and environmental fate data should be on the parent substance where feasible.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that FMC advise the Agency, within 90 days of this posting on the Web site, of any modifications to its submission.

If you have any questions about this response, please contact Mark Townsend, Acting Chief of the HPV Chemicals Branch, at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: M. E. Weber
J. Willis